

VENKAT BALASUBRAMANI (SBN 189192)
FOCAL PLLC
8426 40th Ave SW
Seattle, WA 98136
Fax: (206) 260-3966
Email: venkat@focallaw.com

MATTHEW JELLETT (WSBA No. 34218)
Pro Hac Vice
JELLETT LAW GROUP PS
910 Harris Ave, Ste A205
Bellingham, WA 98225
Fax: (425) 671-1728
Email: matt@jellettlaw.com

Attorneys for Plaintiff
Brad Holtorf

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

BRAD HOLTORF

Plaintiff,

v.

SCOTT VOGLER, an individual; POCKET
BIKES UNLIMITED, a domestic corporation,

Defendants.

Case No. 3:09-CV-04560-EDL

**JOINT STIPULATION TO CONTINUE
HEARING FOR JOINT SCHEDULING
CONFERENCE AND ORDER AS
~~PROPOSED~~ MODIFIED**

Date: January 4, 2010

Plaintiff Brad Holtorf ("Plaintiff"), by and through his counsel of record, and Pro Se Defendant, Scott Vogler, and unrepresented Pocket Bikes Unlimited, hereby stipulate as follows:

WHEREAS, the joint scheduling conference set for January 5, 2010, at 3 p.m. in conference room E with Judge Laporte;

WHEREAS, plaintiff has prepared and provided defendants with a proposed case management statement and discovery plan;

WHEREAS, parties stipulate to extend by 30 calendar days the joint scheduling conference for the following reasons: parties are actively pursuing settlement negotiations; parties require additional time for Defendant Pocket Bikes Unlimited to obtain counsel, Defendant requires additional time for to review and approve Joint Case Management Statement;

WHEREAS, because of the complex nature of the case, regarding patent law, Defendant requires representation of counsel in order to move forward and is actively searching for counsel of record;

WHEREAS, the parties have made no prior request for continuance of the hearing date in connection with the joint case management conference at this time;

It is hereby stipulated, and the parties respectfully request that the court order, that the joint case management conference shall be set for February 5, 2010, at the time of the discretion of the court and that the schedule be adjusted accordingly under the ADR Multi Option Program and pursuant to LR 6-2.

The proposed order is filed concurrently herewith.

Dated this 4th of January, 2010

Respectfully submitted,

Scott Vogler/Pocket Bikes Unlimited

JELLETT LAW GROUP PS
Matthew Jellett

By: /s/ "approved via telephone"
Scott Vogler
Defendant(s)

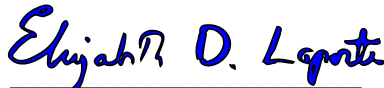
By: /s/ Matthew Jellett
Matthew Jellett
Attorney for Plaintiff
Brad Holtorf

ORDER

Pursuant to local rule CIV 6-2 and the ADR Multi Option Program, the joint scheduling conference shall be set for February 5th, 2010, at 10:00 a.m. ~~at the time of the discretion of the court.~~ The parties are Ordered to file a Joint Case Management Conference Statement by no later than February 2, 2010.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

dated, January, 5th, 2010.



Elizabeth D. Laporte
United States Magistrate Judge